

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

# Application Review

**Issue Date:** XX/XX/XXXX

**Region:** Winston-Salem Regional Office  
**County:** Guilford  
**NC Facility ID:** 4100198  
**Inspector's Name:** Taylor Hartsfield  
**Date of Last Inspection:** 07/20/2016  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>  <b>Applicant (Facility's Name):</b> ITG Brands - Production Operations  <b>Facility Address:</b> ITG Brands - Production Operations 2525 East Market Street Greensboro, NC 27401  <b>SIC:</b> 2111 / Cigarettes <b>NAICS:</b> 312221 / Cigarette Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V				<b>Permit Applicability (this application only)</b>  <b>SIP:</b> 15A NCAC 02D .0503, .0512, .0515, .0516, .0521 <b>NSPS:</b> N/A <b>NESHAP:</b> 15A NCAC 02D .1111 - Subpart JJJJJ <b>PSD:</b> N/A <b>PSD Avoidance:</b> 15A NCAC 02Q .0317 <b>NC Toxics:</b> 15A NCAC 02D .1100 <b>112(r):</b> N/A <b>Other:</b> N/A			
<b>Contact Data</b>				<b>Application Data</b>			
<b>Facility Contact</b>  Angela Davis Industrial Hygienist (336) 335-3267 PO Box 21688 Greensboro, NC 27420	<b>Authorized Contact</b>  Antonio Gutierrez Executive VP, Production Operations (336) 335-6827 PO Box 21688 Greensboro, NC 27420	<b>Technical Contact</b>  Antonio Gutierrez Executive VP, Production Operations (336) 335-6827 PO Box 21688 Greensboro, NC 27420	<b>Application Number:</b> 4100198.15C & 16B <b>Date Received:</b> 07/30/2015 and 10/14/2016 <b>Application Type:</b> Renewal/Modification <b>Application Schedule:</b> TV-Minor <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 04398/T20 <b>Existing Permit Issue Date:</b> 05/16/2016 <b>Existing Permit Expiration Date:</b> 04/30/2021				
<b>Total Actual emissions in TONS/YEAR:</b>							
<b>CY</b>	<b>SO2</b>	<b>NOX</b>	<b>VOC</b>	<b>CO</b>	<b>PM10</b>	<b>Total HAP</b>	<b>Largest HAP</b>
2015	10.79	23.45	312.51	53.09	21.12	3.74	2.60 [Methanol (methyl alcohol)]
2014	7.61	22.45	305.07	50.46	19.32	3.52	2.50 [Methanol (methyl alcohol)]
2013	0.1300	21.55	323.15	53.15	19.37	3.79	2.60 [Methanol (methyl alcohol)]
2012	14.24	22.58	326.64	51.50	19.64	3.40	2.31 [Methanol (methyl alcohol)]
2011	11.50	25.48	330.61	54.05	21.02	3.57	2.31 [Methanol (methyl alcohol)]
<b>Review Engineer:</b> David Hughes  <b>Review Engineer's Signature:</b> <b>Date:</b>					<b>Comments / Recommendations:</b> <b>Issue</b> 04398/T21 <b>Permit Issue Date:</b> XX, XXXX, 2017 <b>Permit Expiration Date:</b> XX, XXXX, 2022		

## **I. Purpose of Applications**

This permitting action is a renewal of an existing Title V permit pursuant to 02Q .0513. The existing Title V permit (**04398T20**) was issued on **May 16, 2016**, with an expiration date of **April 30, 2021**. The renewal application was received on **July 30, 2015**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

Air Permit Application No. 4100198.16B was received on **October 14, 2016** for a minor modification pursuant to 15A NCAC 02Q .0515 to remove (Group 5) ten bagfilters from nine cigarette making lines, remove (Group 3) one Tobacco Processing Plant (TPP) and bagfilter (ID No. CD-03-02), remove and replace two existing 10,000 gallon underground ethanol storage tanks (ID Nos. ES-T-1 and ES-T-2) with one above ground rum storage tank (ES-T-4) and the rum tank (ID No. ES-T-3) will be replaced with a 300 gallon tote (ID No. IRUMTOTE). ITG Brands have also requested that all emission source and control device ID's be revised. Emission source - Central vacuum cleaning system for Tobacco Cutting, Fishburne, Cut Tobacco Storage, and Pre-menthol areas (ID No. ES-08) and control devices – one cyclone and one bagfilter (ID Nos. CD-08-01 and CD-08-02) were not revised.

### **Proposed Changes to Emissions Group 5**

Emission Group 5 consists of nine cigarette making lines (Lines 3 through 11). Each line had four cigarette making machines and was controlled by three parallel bagfilters; twenty-seven total. ITG Brands has removed cigarette making machines from each line and proposes to stop operating ten of the bagfilters as they are no longer needed due to the reduction of the number of cigarette making machines. The particulate matter emissions from Emission Group 5 were calculated based on the rated bagfilter flow rates and exit grain loadings. The current potential to emit for Emissions Group 5 based on twenty-seven bagfilters is 14.5 tons per year (ton/year) of PM10 and PM2.5. With the shutdown of ten bagfilters, the potential PM10 and PM2.5 emissions from seventeen bagfilters will be 8.8 ton/year.

### **Proposed Changes to Emissions Group 3**

Emission Group 3 consists of the Dry Ice Expanded Tobacco (DIET) process (ID No. ES-03-01) consisting of:

- One impregnation chamber where CO<sub>2</sub> and water are added to the tobacco, and
- One Tobacco Processing Plant (TPP) where frozen tobacco is reheated with steam and indirect air. (1.25 tons per hour capacity)

ITG Brands has proposed to remove TPP, which includes the reheat system, and leave the idled control device, bagfilter ID No. CD-03-02 in place. The bagfilter will not be operated and a reduction in particulate matter emissions will result from the elimination of the reheat system. Both TPP and CD-03-02 have been removed from the permit.

### **Proposed Changes to Ethanol Tanks**

ITG Brands proposes removing the two existing 10,000 gallon (each) underground ethanol storage tanks (ID Nos. ES-T-1 and ES-T-2), and the existing 21,000 gallon above ground rum (ethanol) tank (ID No. ES-T-3). The two ethanol tanks will be replaced with a single 10,000 gallon above ground stainless steel tank (ID No. ES-T-4), and the rum tank will be replaced with a 300 gallon tote (ID No. IRUMTOTE). The ethanol emissions estimate for the 10,000 gallon ethanol tank ES-T-4 was based on USEPA Tanks 4.09d emissions report. Ethanol emissions from the ethanol tank based on 16,000 gallons per year throughput are 0.1 tons per year. The rum tank IRUMTOTE is classified as an "Insignificant Activity" per 15A NCAC

02Q .0503(8): “Insignificant activities because of size or production rate” means any activity whose emissions would not violate any applicable emissions standard and whose potential emission of particulate, sulfur dioxide, nitrogen oxides, volatile organic compounds, and carbon monoxide before air pollution control devices, i.e., potential uncontrolled emissions, are each no more than five tons per year and whose potential emissions of hazardous air pollutants before air pollution control devices, are each below 1000 pounds per year.

### **Proposed Changes to Central Process Vacuum System (ICPVS)**

Dorothy Vannoy of ITG Brands sent a letter on February 9, 2017 to David B. Hughes requesting a permit modification applicability determination on an emission source in the Insignificant Activities section. The emission source is a process vacuum system (ICPVS) which currently has 2 vacuums that each service half of the production floor. With the requested modification, the vacuums will be connected in parallel so that one vacuum may be utilized at a time to service the entire production floor, but have the capability to be run simultaneously if needed. Since the central process vacuum system (ICPVS) is in the Insignificant Activities section and there will be no increase in emissions, a permit modification applicability determination will not be required.

## **II. Facility Description**

The ITG Brands – Production Operations facility is a cigarette manufacturing facility that manufactures about 200 million cigarettes per day.

## **III. History/Background/Application Chronology**

<b>Date</b>	<b>Description</b>
05/20/2015	Annual Compliance inspection completed by Hilary King of WSRO.
07/28/2015	Permit <b>04398T19</b> issued with Minor Modifications as a Title V permit.
07/30/2015	Permit Application <b>4100198.15C</b> received as a Title V permit renewal/modification application. The application was deemed complete for processing.
02/04/2016	New Permit Application <b>4100198.16A</b> is created. It is a modification/TV minor and is separate from the renewal application. The application was deemed complete for processing.
04/15/2016	DRAFT permit sent to Permittee and WSRO for comment.
05/16/2016	Permit <b>04398T20</b> issued as a minor modification for Central Vacuum Cleaning Systems ID No. ES-08 and Control Devices Cyclone and Bagfilter; ID Nos. CD-08-01 and CD-08-02.
07/20/2016	Annual Compliance inspection completed by Taylor Hartsfield of WSRO.
10/14/2016	Permit Application <b>4100198.16B</b> is created. It is a modification/TV minor and is separate from the renewal application. The application was deemed complete for processing.
02/09/2017	Dorothy Vannoy of ITG Brands sent David B. Hughes a letter requesting a permit modification applicability determination on a process vacuum system (ICPVS) in the Insignificant Activities section.
02/14/2017	David B. Hughes replied to Dorothy Vannoy’s letter in an e-mail stating that a permit modification applicability determination on process vacuum system (ICPVS) will not be required.
02/27/2017	DRAFT permit sent to Permittee and WSRO for comment prior to public notice and EPA review. The Permittee provided comments on draft permit via e-mail on <b>March 17, 2017</b> . No comments were received from WSRO.
04/07/2017	DRAFT permit sent to 30-day public notice and 45-day EPA review. The 30-day public comment period ended <b>XX XX, 2017</b> with the receipt of no comments. The 45-day EPA review period ended <b>XX XX, 2017</b> with the receipt of no comments.

#### IV. Permit Modifications/Changes

Page(s)	Section	Description of Change(s)
Cover letter	---	-modified to reflect current permit number, issue and effective dates.
All	Headers	-updated permit revision number, issue and effective dates.
---	Insignificant Activities	-added 300 gallon rum tank (IRUMTOTE) which replaces existing 21,000 gallon above ground rum (ethanol) tank (ES-T-3).
	2.1 A.2. d. e. & f.	-removed language due to No. 6 fuel oil no longer being used.
	2.1 A.3. d. e. & f.	-removed language due to No. 6 fuel oil no longer being used.
5	Section 1 (Table) and 2.1 B	-changed Tobacco Screen Material Collection ID No. ES-02.1 to ES-05.1 and Bagfilter ID No. CD-02-01 to CD-05-01. -changed Cigarette Making Operations (Line 3 through Line 11) ID Nos. ES-02.3 through ES-02.11 to ES-05.3 through ES-05.11 and Bagfilters ID Nos. CD-02-06 through CD-02-33 to CD-05-06 through CD-05-33. -removed ten Bagfilters ID Nos. Cd-02-26, CD-02-08, CD-02-28, CD-02-12, CD-02-34, CD-02-15, CD-02-17, CD-02-20, CD-02-22, and CD-02-23.
30-32	Section 1 (Table) and 2.1 C	-changed Tobacco cutting and blending process ID No. ES-03.1 to ES-02-1 and Bagfilters ID Nos. CD-03-01 through CD-03-03 to CD-02-01 through CD-02-03. -changed Hauni Steam dryer no. 1 ID No. ES-03.2 to ES-02-07 and Bagfilter from CD-03-04 to CD-02-04. -changed Associated Hauni Steaming tunnel no. 1 ID No. ES-03.3 to ES-02-08. -changed Hauni Steam dryer no. 2 ID No. ES-03.4 to ES-02-09 and Bagfilter from CD-03-07 to CD-02-05. -changed Associated Hauni Steaming tunnel no. 2 ID No. ES-03.5 to ES-02-10. -changed Top flavoring line no. 1 ID No. ES-03.6 to ES-04-1 and Bagfilter and Packed Tower Scrubber ID Nos. CD-03-05 and CD-03-06 to CD-04-01 and CD-04-06. -changed Top flavoring line no. 2 ID No. ES-03.7 to ES-04-2 and Bagfilter and Packed Tower Scrubber ID Nos. CD—3-05 and CD-03-09 to CD-04-02-09. -removed 15A NCAC 02D .0958
	Section 1 (Table) and 2.1 D	-changed Tobacco reclamation ID No. ES-04 to ES-06 and four Bagfilters ID Nos. CD-04-01 through CD-04-04 to CD-06-01 through CD-06-04.

	Section 1 (Table) and 2.1 E	-changed Cigarette reclamation ID No. ES-05 to ES-07 and three Bagfilters ID Nos. CD-07-01 through CD-07-03.
	Section 1 (Table) and 2.1 F	-changed two burley tobacco steam dryers ID Nos. ES-06A and ES-06B to ES-02-05A and ES-02-05B. -removed 15A NCAC 02D .0958
	Section 1 (Table) and 2.1 H	-changed Dry Ice Expanded Tobacco (DIET) process ID No. ES-09 to ES-03-01 and one pulse-jet Bagfilter ID No. CD-09-01 to CD-03-01. -removed One Tobacco Processing Plant (TPP) and associated Bagfilter CD-03-02. -removed 15A NCAC 02D .0958
	2.1 H.2. c. d. e. & h.	-removed Monitoring/Recordkeeping for Bagfilter CD-03-02 (2.1 H.2. c. d. e. & h.) and renumbered (2.1 H.2. f. g. & i) to (2.1 H.2. c. d. & e.)
	2.1 I	-removed 15A NCAC 02D .0958
	Section 1 (Table)	-removed Two underground ethanol storage tanks ID Nos. ES-T-1 and ES-T-2 and replaced with one 10,000 gallon above ground rum storage tank ES-T-4.
	2.2 A	-removed 15A NCAC 02D .0958. replaced 2.2 A with 2.2 B 15A NCAC 02D .1100
	2.2 A.1 (Table)	-changed Stack ID Nos. and Emission Source ID Nos.
41-51	General Conditions	-updated shell conditions (v4.0 12/17/15).
52	List of Acronyms	-updated to current list of acronyms.

There were many non-significant modifications to the equipment descriptions needed in the Title V Equipment Editor (TVEE).

## V. Regulatory Review

The facility is currently subject to the following regulations:

15 NCAC 02Q .0317, Avoidance Conditions for 15A NCAC 02D .0530: Prevention of Significant Deterioration  
15 NCAC 02D .0503, Particulates Fuel Burning Indirect Heat Exchangers  
15 NCAC 02D .0512, Particulates Wood Products Finishing Plants  
15 NCAC 02D .0515, Particulates Miscellaneous Industrial Processes  
15 NCAC 02D .0516, Sulfur Dioxide Emissions Combustion Sources  
15 NCAC 02D .0521, Control of Visible Emissions  
15 NCAC 02D .1100, Control of Toxic Air Pollutants  
15 NCAC 02D .0614, Compliance Assurance Monitoring

## **VI. Facility Compliance Status**

This facility was last inspected on July 20, 2016 by Taylor Hartsfield of the WSRO. According to Mr. Hartfield's report, the facility appeared to be operating in compliance.

## **VII. NSPS, NESHAP, MACT/GACT, PSD, Attainment Status, 112(r), and CAM**

### **NSPS**

New Source Performance Standards (NSPS) do not apply to this renewal/modification. This permit renewal/modification does not affect this status.

### **NESHAP/MACT**

15A NCAC 2D .1111, Maximum Achievable Control Technology - 40 CFR 63, Subpart JJJJJ, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers" - The boilers (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**) at this facility are subject to the area source requirements of this MACT. The GACT language has been updated and is current. Compliance was demonstrated by performing tune up and energy assessment prior to July 19, 2014. The tune up requirement for the boilers was met on January 6, 2012 (**ES-01-A**), November 9, 2011 (**ES-01-B**), and November 8, 2011 (**ES-01-C**), and the energy assessment requirement was met on August 15, 2012. This permit renewal/modification does not affect this status.

### **PSD**

Prevention of Significant Deterioration (PSD) does not apply to this renewal/modification. 15A NCAC 02Q .0317, Avoidance Conditions for 15A NCAC 02D .0530: Prevention of Significant Deterioration is applicable to emission sources (**ID Nos. ES-02-1, ES-04-1, ES-04-2, ES-04-3, ES-02-02, ES-02-03 and ES-03-04**). This permit renewal/modification does not affect this status.

### **Attainment Status**

Guilford County has been classified as attainment for 8-hr ozone standard. This permit renewal/modification does not affect this status.

## **112(r)**

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal/modification does not affect this status.

## **CAM**

A continuous compliance assurance monitoring (CAM) (40 CFR Part 64) was not required for the renewal/modification. CAM applicability was addressed previously. Currently only one source in ITG Brands permit, Tobacco reclamation (**ID No. ES-06**) is subject to a CAM plan. This permit renewal/modification does not affect this status.

## **VIII. Facility Wide Air Toxic Air Pollutants**

This renewal/modification does not trigger NC Air toxics under 02D .1100. This permit renewal/modification does not affect this status.

## **IX. Facility Emission Review**

See table in the header for a summary of the actual emissions as reported to DAQ from the years 2011 to 2015.

## **X. Public Notice/EPA and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. Virginia and the Forsyth County Office of Environmental Assistance and Protection are affected areas within 50 miles of this facility and will be notified accordingly.

## **XI. Conclusions, Comments and Recommendations**

The issuance of Air Quality Permit No. 04398T21 to ITG Brands – Production Operations is recommended.